

## Recommendations for SF DD VTC Discussion on Options for Special Account Management

The following provides recommendations developed by OSRTI regarding special account management and utilization. The recommendations are based on feedback received from the regions to the options presented in the September 19, 2011 paper, "Management and Utilization of Special Accounts." The background section provides a summary of regional responses.

### **RECOMMENDATIONS**

#### Accounts with more than \$1M available or \$0 obligated past 5 years (Options 4 and 6)

- Regional SF DDs are requested to review accounts with more than \$1M available or \$0 obligated past 5 years annually to ensure effective utilization. No certification required.
- As part of annual and mid-year work planning review cycles, regions and HQ will closely review accounts with more than \$1M available or \$0 obligated past 5 years.
- These efforts will allow the program to closely monitor and increase accountability for 90% of available resources that reside in 25% of open accounts. (see background section below)
- OSRTI will work with OCFO and other staff to develop reports to identify accounts with \$0 obligated in the past 5 years.

#### Long-term use of special account funds (Option 1)

- Regions should plan to retain and use special account funds for **no more than 15 years** after the associated site achieves construction completion. This includes O&M, Five Year Reviews, LTRAs.
- Funds may be retained for more than 15 years after site CC is achieved based on site-specific circumstances and/or specific settlement language. Regions need to consult with HQ on those circumstances.

#### Accounts with less than \$25,000 available (Option 5)

- Regions and HQ will evaluate special accounts with less than \$25,000 available for potential closure as part of the annual work planning and mid-year review planning cycles. Currently HQ focuses on those accounts with less than \$10,000 available.

#### Use of special account resources before appropriated funds (Options 2 and 3)

- Regions and HQ will review as part of annual work planning and mid-year reviews sites with unliquidated obligations of appropriated funds where special account funds may be available to replace those appropriated funds.
- OSRTI will continue to review as part of requests for funding from the remedial action (RA) site allowance available special account resources and if those funds can be used prior to appropriated resources.

### **NEXT STEPS**

- OSRTI and Region 2 will report to the Special Accounts Senior Management Committee the results of this discussion at their meeting to be scheduled for December.
- If the Committee requests any further information or action, OSRTI and Region 2 will follow-up with the Superfund Division Directors.
- OSRTI will work with OCFO and other staff to develop reports to identify accounts with \$0 obligated in the past 5 years.

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### **BACKGROUND**

- The following table depicts, by account available balance as of August 4, 2011, the cumulative number of accounts, available balance, and disbursements/unliquidated obligations.

Available Balance	No. of Accounts		Sum of Available Balance		Sum of Obligations	
Greater than \$10 Million	32	3%	\$960,719,867	54%	\$471,753,307	23%
Between \$5M and \$10M	30	3%	\$212,894,013	12%	\$290,154,108	14%
Between \$2M and \$5M	101	10%	\$307,111,719	17%	\$426,111,307	21%
Between \$1M and \$2 Million	82	8%	\$115,041,382	6%	\$140,532,428	7%
Between \$500K and \$1 Million	135	14%	\$96,440,696	5%	\$159,803,944	8%
Between \$250K and \$500K	137	14%	\$51,781,401	3%	\$75,824,354	4%
Between \$25K and \$250K	320	33%	\$31,044,528	2%	\$271,339,557	13%
Less than \$25K	140	14%	\$979,151	0%	\$225,325,848	11%
<b>Total</b>	<b>977</b>		<b>\$1,776,012,757</b>		<b>\$2,060,844,853</b>	

- The following table depicts a summary of regional responses to the options provided in the “Management and Utilization of Special Accounts” paper dated September 19, 2011. The categories depicted are based on OSRTI’s assessment of the feedback received from the regions.

Exemption 5 - Deliberative Process